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February 28, 2014

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Suite TW-A325
Washington, DC 20554

**Re: ItsOn, Inc. - Filer ID: 829635
Calendar Year 2013 - CPNI Compliance Certification
EB Docket No. 06-36**

Dear Ms. Dortch:

On behalf of ItsOn, Inc. ("ItsOn"), and pursuant to 47 C.F.R. § 64.2009(e), enclosed is the Company's 2013 CPNI compliance certification.

Please direct any questions regarding this submission to the undersigned.

Very truly yours,

/s/ Ronald W. Del Sesto, Jr.

Ronald W. Del Sesto, Jr.

Enclosure

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ItsOn, Inc.
Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2013 covering the prior calendar year (2013)

Date filed: February 26, 2014

Name of company covered by this certification: ItsOn, Inc.

Form 499 Filer ID: 829635

Name of Signatory: David Jonhson

Title of signatory: Chief Operating Officer, Chief Financial Officer

I, David Johnson, certify that I am an officer of the company named above ("ItsOn"), and acting as an agent of ItsOn, that I have personal knowledge that ItsOn has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

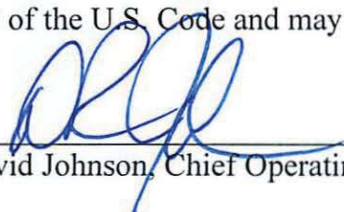
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

ItsOn America has not taken any actions (*i.e.*, proceedings instituted or petitions filed by a company at state commissions, the court system, or at the Commission) against data brokers in the past year.

ItsOn has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

ItsOn represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. ItsOn also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed _____


David Johnson, Chief Operating Officer, Chief Fiancial Officer

Attachment: Accompanying Statement explaining CPNI procedures

ItsOn, Inc.
Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Accompanying Statement

ItsOn, Inc. ("ItsOn") offers is a MVNO offering services through the brand name "Zact Mobile." ItsOn is committed to protecting the confidentiality of all customer information including CPNI. ItsOn has adopted comprehensive policies and procedures to protect CPNI. ItsOn has met its obligation under relevant law and Commission rules by establishing written policies and procedures describing ItsOn's obligations under the law as well as its internal compliance policies and procedures.

ItsOn has a policy of providing regular written opt-out CPNI notices to all customers to use CPNI for marketing purposes. ItsOn also provides existing customers with the ability to change or rescind their consent to the Company's use of their CPNI at any time. ItsOn's CPNI notices explain the customers' CPNI rights in accordance with the FCC's CPNI rules, including their right to restrict the use and disclosure of, and access to their CPNI. These notices also provide information on how customers can choose to not receive marketing from ItsOn that is based upon the Company's use of their CPNI. From time to time, ItsOn may use CPNI to market communications-related services outside of those services to which a customer already subscribes but only where the customer has granted approval pursuant to instructions in the CPNI notices. ItsOn maintains records of customer approval and the delivery of its CPNI notices for at least one year.

As permitted by the CPNI rules, the ItsOn may use CPNI without customer approval (1) to bill and collect for services rendered; (2) to protect the rights or property of ItsOn, other users or other carriers from unlawful use; (3) to provide customer premises equipment and protocol conversion; (4) to provision maintenance and repair services; and (5) to market services formerly known as adjunct-to-basic services.

ItsOn has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use or disclosure of that customer's CPNI. Specifically, ItsOn maintains an account management system for tracking accounts where the customer has not approved use of their CPNI for marketing purposes. ItsOn representatives who market to existing customers are required to check internal systems to determine whether a customer has a CPNI restricted account, and if so, they must refrain from marketing to that customer.

ItsOn does not share, sell, lease or otherwise provide CPNI to any of its affiliates, suppliers, vendors or any other third parties for the purposes of marketing any services. The provision of CPNI to any unrelated third party is limited to the following activities: billing, for the provision of services, for the provision, maintenance and repair of services, or to protect rights or property of ItsOn, or pursuant to legal process. Where third parties are relied on for the provision of a particular service and where such third parties will have access to CPNI, ItsOn enters into agreements that specifically limit the use of CPNI for the provision of the relevant service,

address the protection of such data, detail obligations should a breach of such data occur and customers are notified that CPNI will be shared for the provision of the specific service.

All ItsOn employees who have access to CPNI receive training about CPNI compliance. Specifically, all such new employees are provided with CPNI training at new-hire orientation that is based upon the policies and procedures set forth in ItsOn's CPNI Manual. All ItsOn employees are required to maintain the confidentiality of all information, including CPNI that is obtained as a result of their employment by ItsOn. Employees who do not abide by these policies or otherwise permit the unauthorized use or disclosure of CPNI are subject to discipline, which may include termination.

ItsOn has in place procedures to ensure that it will provide written notice to the FCC within five business days of it becoming aware of any instance where its opt-out mechanisms do not work properly to such a degree that its customers' inability to opt-out is more than an anomaly. These procedures ensure that the notice will be in the form of a letter, and will include: (i) ItsOn's name; (ii) a description of the opt-out mechanism(s) used; (iii) the problem(s) experienced; (iv) the remedy proposed and when it will be or was implemented; (v) whether the relevant state commission(s) has been notified; (vi) whether ItsOn has taken any action; (vii) a copy of the notice provided to customer(s); and (viii) contact information. ItsOn will submit the above letter to the FCC even if it offers other methods by which its customers may opt-out.

ItsOn has established procedures such that it will not provide CPNI without proper customer authentication for both inbound telephone calls and online account access. In order to authenticate a customer's identity prior to disclosing CPNI, ItsOn authenticates the customer using a variety of methods. ItsOn does not provide call detail records over the phone. Call detail records are provided to a customer's address of record or to the customer by contacting them at their telephone number of record. ItsOn has implemented a backup method for allowing customers to change passwords in the event that passwords are lost or forgotten that conforms to the relevant FCC rules. ItsOn has implemented procedures to inform customers of change of address, e-mail and other changes to account information in a manner that conforms with the relevant FCC rules.

In the event of a CPNI breach, ItsOn has implemented procedures to notify law enforcement, including the United States Secret Service and Federal Bureau of Investigation as required by the CPNI rules. After notifying law enforcement and unless directed otherwise, ItsOn will notify affected customers. ItsOn will maintain a record of any CPNI-related breaches for a period of at least two years.